

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

**DIVERSE MEDICAL
MANAGEMENT, INC.; AND AZZAM
MEDICAL SERVICES, LLC,**

Plaintiffs,

v.

**PLATINUM GROUP USA, INC.;
AMER RUSTOM; THE THIRD
FRIDAY TOTAL RETURN FUND, L.P.,
MICHAEL LEWITT, AMERICORE
HEALTH, LLC, GRANT WHITE,
JAMES B. BIDEN,**

Defendants.

**Case No: 19-CV-00046
JURY DEMAND**

DECLARATION OF DR. MOHANNAD F. AZZAM, M.D.

I, Mohannad F. Azzam, hereby declare as follows:

1. I am over 21 years of age and if called as a witness I could and would testify competently to the matters set forth in this declaration. I make this declaration based on my personal experiences and knowledge of the facts set forth herein.

2. I am the President, founder, and sole member of Azzam Medical Services, LLC. (“AMS”).

3. Between mid-October and early November of 2018, I first spoke with James Biden. I took the call from my home in Hoover, Alabama. Michael Frey was also on the call. The purpose of the call was to introduce me to James Biden and for me to present my vision for nursing home and rural healthcare, in accordance with the DMM model for psychiatric care.

4. After I explained my background and business model at length, Mr. Biden said that he was impressed. He mentioned that he wished that he and I had met before he had to deal with Grant White and Americore. James Biden then asked me specifically if he gave us the contract, could we manage the Americore hospitals. I stated that we would be happy to help, but that we needed more information on the current situation and these hospitals and explained that managing these hospitals would be a tough task knowing that they were having extreme financial issues including large debts.

5. During this conversation, James Biden mentioned that his brother's connections to labor unions and the Department of Veterans Affairs would help DMM expand its model nationwide. Also during this conversation, James Biden made the promise "on the Biden's family name" that he and Mr. Lewitt would cover all the expenses for DMM until funding was secured by an international funding source, which Michael Frey and I were told repeatedly was imminent, on multiple occasions.

6. In another telephone conversation I took in Alabama, Mr. Biden told Michael Frey and me that the DMM psychiatric care model would be used by Joe Biden as part of his campaign for President of United States, or words to that effect. At the time, Joe Biden was reportedly preparing to enter the presidential campaign, but he had not yet officially declared it.

7. In early November of 2018, I talked to James Biden and Michael Lewitt on the telephone while I was in Alabama. They represented to me that they needed a power point presentation for a diabetic program that could be implemented in the Middle East, specifically Qatar. On November 7, 2018, I email Mr. Biden and Mr. Lewitt an overhead quick review of the structure of the diabetic program.

8. On December 7, 2018, I was contacted by Mr. Biden via email asking me if I could put together a financial model for the diabetic program. I responded “yes we can.” In a follow up email, I was asked if I could have the information ready to present to Amer Rustom in the next couple of days. My response was “would be tough

9. In early February of 2019, I spoke to Amer Rustom and Michael Frey on the phone while I was home in Alabama. Mr. Rustom told me the investment was approved and everything would be completed within two weeks.

10. On April 15, 2019, I sent a text message to James Biden informing him that if the investment was not finalized, DMM could take legal action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 21, 2019.



MOHANNAD F. AZZAM, M.D.